

1 JAMES D. BOYLE  
2 Nevada Bar No. 08384  
3 COTTON, DRIGGS, WALCH,  
4 HOLLEY, WOLOSON & THOMPSON  
5 400 South Fourth Street, Third Floor  
6 Las Vegas, Nevada 89101  
7 Telephone: 702/791-0308  
8 Facsimile: 702/791-1912  
9 Email: [jboyle@nevadafirm.com](mailto:jboyle@nevadafirm.com)

10 JAMES P. FOGELMAN  
11 Nevada Bar No. 09803  
12 SHANNON E. MADER  
13 Cal. Bar No. 235271, *admitted pro hac vice*  
14 RACHEL N. PERAHIA  
15 Cal. Bar No. 266877, *admitted pro hac vice*  
16 GIBSON, DUNN & CRUTCHER LLP  
17 333 South Grand Avenue  
18 Los Angeles, California 90071-3197  
19 Telephone: 213/229-7000  
20 Facsimile: 213/229-6234  
21 Email: [jfogelman@gibsondunn.com](mailto:jfogelman@gibsondunn.com)  
22 [smader@gibsondunn.com](mailto:smader@gibsondunn.com)  
23 [rperahia@gibsondunn.com](mailto:rperahia@gibsondunn.com)

24 *Attorneys for Defendant Rio Properties, Inc.*

15  
16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 JOHN P. BRINCKO, as Chapter 11 Trustee of  
19 Debtor National Consumer Mortgage, LLC,

20 Plaintiff,

21 v.

22 RIO PROPERTIES INC.,

23 Defendant.

24 CASE NO.: 2:10-cv-00930-PMP-PAL

25 **DEFENDANT RIO PROPERTIES, INC.'S  
UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE  
RESPONSE TO ORDER TO SHOW  
CAUSE REGARDING SEALED  
DOCUMENTS**

26 **(First Request)**

27 Pursuant to LR 6-1 and LR 6-2, Defendant Rio Properties, Inc. (the "Rio") hereby  
28 submits this Unopposed Motion for Extension of Time to File Response to Order to Show Cause  
29 Regarding Sealed Documents (the "Motion"). The Rio respectfully requests that this Court grant  
30 the Rio a ten (10) day extension to file a response to the Order to Show Cause entered by the

1 Court on May 8, 2014 (Dkt. No. 390) (the “OSC”). The Rio has received confirmation from  
2 counsel for Plaintiff John P. Brincko, as Chapter 11 Trustee of Debtor National Consumer  
3 Mortgage, Inc. (the “Trustee”), that the Trustee does not oppose the Rio’s Motion.

4 By its Order, the Court required the Rio and the Trustee to “show cause, in writing no  
5 later than June 6, 2014, why each of the sealed filings in this case should not be unsealed”, and  
6 further required the parties to provide a redacted copy of any document for which the Rio and/or  
7 the Trustee sought to seal only a portion of the document. *See OSC*, at 2:6-9.

8 This case involved the filing of hundreds of pleadings and records, including thousands  
9 of pages of exhibits thereto, as well as the presentation of hundreds of multiple-page trial  
10 exhibits. Many of these documents and exhibits were initially filed under seal *in toto*. The Rio  
11 is making a diligent review of all documents and exhibits that were filed with this Court, as well  
12 as those that were filed originally with the United States Bankruptcy Court for the Central  
13 District of California, to ensure that all documents for which the Rio believes a justification for  
14 retaining the sealed filing of a document or exhibit—in whole or in part—are properly identified  
15 in the Rio’s response to the OSC. In particular, the Rio is aware that multiple documents contain  
16 information that is subject to this Court’s Special Order No. 108. The Rio must prepare a  
17 redacted copy of the document that properly protects private individual information pursuant to  
18 Special Order No. 108, and present the redacted substitute document in compliance with the  
19 OSC. The Rio needs a short additional time period in which to ensure that it has completed its  
20 review of all of these documents and exhibits, and has prepared a thorough response to the OSC.

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1 Thus, the Rio respectfully requests that this Court provide a ten (10) day extension—  
2 through and including June 16, 2014—for the Rio to prepare and submit its response to the OSC.  
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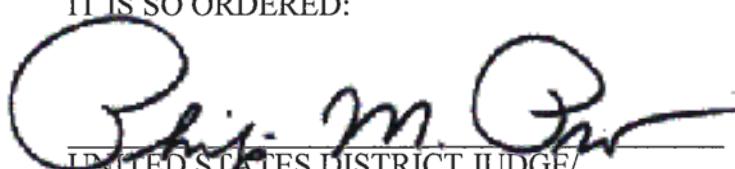
4 DATED this 6th day of June, 2014.  
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6 **COTTON, DRIGGS, WALCH,  
7 HOLLEY, WOLOSON & THOMPSON**

8 /s/ James D. Boyle  
9  
10 JAMES D. BOYLE  
11 Nevada Bar No. 08384  
12 400 South Fourth Street, Third Floor  
13 Las Vegas, Nevada 89101  
14

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16  
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22 Cal. Bar No. 266877, *admitted pro hac vice*  
23 333 South Grand Avenue  
24 Los Angeles, California 90071-3197  
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26 *Attorneys for Defendant Rio Properties, Inc.*  
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**CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5(b), I certify that on the 6<sup>th</sup> day of June, 2014, I caused the document entitled **DEFENDANT RIO PROPERTIES, INC.'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO ORDER TO SHOW CAUSE REGARDING SEALED DOCUMENTS**, to be served as follows:

Attorneys of Record	Parties Represented	Method of Service
John R. Bailey, Esq. Dennis L. Kennedy, Esq. BAILEY KENNEDY LLP 8984 Spanish Ridge Avenue Las Vegas, Nevada 89148	John P. Brincko <i>Chapter 11</i> <i>Trustee of Debtor</i> <i>National</i> <i>Consumer</i> <i>Mortgage LLC</i>	<input type="checkbox"/> Personal Service <input checked="" type="checkbox"/> Email/E-File <input type="checkbox"/> Fax Service <input type="checkbox"/> Mail Service
Bijan Amini, Esq. Lita Beth Wright, Esq. Noam Besdin, Esq. STORCH AMINI & MUNVES P.C. 140 East 45 <sup>th</sup> Street New York, New York 10017	John P. Brincko <i>Chapter 11</i> <i>Trustee of Debtor</i> <i>National</i> <i>Consumer</i> <i>Mortgage LLC</i>	<input type="checkbox"/> Personal Service <input checked="" type="checkbox"/> Email/E-File <input type="checkbox"/> Fax Service <input type="checkbox"/> Mail Service

An employee of Cotton, Driggs, Welch, Honey, Woloson & Thompson